

United States District Court  
Southern District of Texas /  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

APR 25 2017

*David J. Bradley, Clerk*

UNITED STATES OF AMERICA

v.

RAUL MARIO RODRIGUEZ, JR.  
JUAN PEREZ-ALCOSER  
JOSE ~~NARO~~LEON RODRIGUEZ  
MAPOLEON (jl)

§  
§  
§  
§  
§  
§

Criminal No. M-16-0804-S2

**SECOND SEALED SUPERSEINDG INDICTMENT**

**THE GRAND JURY CHARGES:**

**Count One**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

**Count Two**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

knowing and in reckless disregard of the fact that Oliver Santamaria-Rendon was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Three**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

knowing and in reckless disregard of the fact that Wendy Elizabeth Perez-Perez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Four**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

knowing and in reckless disregard of the fact that Hilda Irene Perez-Reyes was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Five**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is, from a location near Mission, Texas, to another location near Mission, Texas, by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

**Count Six**

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER  
and  
JOSE NAPOLEON RODRIGUEZ**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

**Count Seven**

From on or about May 6, 2016, to on or about May 9, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER  
and  
JOSE NAPOLEON RODRIGUEZ  
MAPOLEON (jl)**

knowing and in reckless disregard of the fact that Oliver Santamaria-Rendon was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Eight**

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER**  
and  
**JOSE XXXXXXXX RODRIGUEZ**  
MAPOLEON (jl)

knowing and in reckless disregard of the fact that Wendy Elizabeth Perez-Perez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Nine**

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER**  
and  
**JOSE XXXXXXXX RODRIGUEZ**  
MAPOLEON (jl)

knowing and in reckless disregard of the fact that Hilda Irene Perez-Reyes was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Ten**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

did knowingly and intentionally conspire and agree with other person and persons known and unknown to the Grand Jurors, to seize and detain and threaten to kill, injure, or continue to detain another person in order to compel a third person to pay money as an explicit or implicit condition for the release of the person detained.

In violation of Title 18, United States Code, Section 1203(a).

**Count Eleven**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Oliver Santamaria-Rendon in order to compel Rafael Rodriguez-Rendon to pay money as an explicit or implicit condition for the release of Oliver Santamaria-Rendon.

In violation of Title 18, United States Code, Section 1203 and 2.

**Count Twelve**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Wendy Elizabeth Perez-Perez in order to compel Jairo Muralles and Miguel Angel Perez-Aguilar to pay money as an explicit or implicit condition for the release of Wendy Elizabeth Perez-Perez.

In violation of Title 18, United States Code, Section 1203 and 2.

**Count Thirteen**

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RAUL MARIO RODRIGUEZ, JR.**

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Hilda Irene Perez-Reyes in order to compel Rigoberto Perez-Reyes and Leodan Muralles-Perez to pay money as an explicit or implicit condition for the release of Hilda Irene Perez-Reyes.

In violation of Title 18, United States Code, Section 1203 and 2.

**Count Fourteen**

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER  
and  
JOSE ~~XXXXXXXXXX~~ RODRIGUEZ  
MAPOLEON (jl)**

did knowingly and intentionally conspire and agree together and with other person and persons known and unknown to the Grand Jurors, to seize and detain and threaten to kill, injure, or continue to detain another person in order to compel a third person to pay money as an explicit or implicit condition for the release of the person detained.

In violation of Title 18, United States Code, Section 1203(a).

**Count Fifteen**

From on or about May 6, 2016, to on or about May 9, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER  
and  
JOSE ~~MAPOLEON~~ RODRIGUEZ  
MAPOLEON (jl)**

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Oliver Santamaria-Rendon in order to compel Rafael Perez-Rendon to pay money as an explicit or implicit condition for the release of Oliver Santamaria-Rendon.

In violation of Title 18, United States Code, Section 1203 and 2.

**Count Sixteen**

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER  
and  
JOSE ~~MAPOLEON~~ RODRIGUEZ  
MAPOLEON (jl)**

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Wendy Elizabeth Perez-Perez in order to compel Jairo Muralles and Miguel Angel Perez-Aguilar to pay money as an explicit or implicit condition for the release of Wendy Elizabeth Perez-Perez.

In violation of Title 18, United States Code, Section 1203 and 2.

**Count Seventeen**

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER  
and  
JOSE ~~MAPOLEON~~ RODRIGUEZ  
MAPOLEON (jl)**

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Hilda Irene Perez-Reyes in order to compel Rigoberto Perez-Reyes and Leodan Muralles-Perez to pay money as an explicit or implicit condition for the release of Hilda Irene Perez-Reyes.

In violation of Title 18, United States Code, Section 1203 and 2.

A TRUE BILL





\_\_\_\_\_  
FOREPERSON 

ABE MARTINEZ  
ACTING UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ASSISTANT UNITED STATES ATTORNEY